



February 2, 2006

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Reference: EB-06-TC-060, Certification of CPNI Filing of Bristol Bay Cellular Partnership (#809089)

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate and accompanying statement for the year ended December 31, 2005 of Bristol Bay Cellular Partnership (# 809089) in response to the Public Notice issued by the Federal Communication Commission's Enforcement Bureau on January 30, 2006. The Enforcement Bureau has requested the compliance certificate as required by section 64.2009(e) of the Commission's rules.

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Dennis Niedermeyer', written over a horizontal line.

Dennis Niedermeyer  
General Manager

cc: Byron McCoy, [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Best Copy and Printing, Inc. (BCPI), [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

Before the  
Federal Communications Commission  
Washington, D.C. 20554

CPNI Compliance Certification	)	EB-06-TC-060
As Required by FCC Enforcement	)	Bristol Bay Cellular Partnership
Bureau, DA 06-223	)	# 809089

**BRISTOL BAY CELLULAR PARTNERSHIP.  
CERTIFICATION OF CPNI FILING (February 2, 2006)**

1. Bristol Bay Cellular Partnership ("BBCP") (# 809089) is submitting this compliance certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223), pursuant to section 64.2009(e) of the Commission's rules.
2. Bristol Bay Cellular Partnership does not use CPNI for marketing purposes. Accordingly, Bristol Bay Cellular Partnership's personnel are trained not to use CPNI for such purposes. Because CPNI is not used for marketing purposes, Bristol Bay Cellular Partnership has established the appropriate safeguards for this type of treatment (non-use) of CPNI data. These safeguards include documentation of this policy in company procedures and training of company personnel with regard to non-use of CPNI data.
3. This certification is signed below by an officer of Bristol Bay Cellular Partnership, who has personal knowledge that Bristol Bay Cellular Partnership has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2009 (CPNI) rules currently in effect and the statements contained in this filing are correct.

s/Via ECFS on 2/2/06; Original on file at company



Dennis Niedermeyer  
General Manager

## STATEMENT

Bristol Bay Cellular Partnership ("BBCP") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI"). Use of CPNI is prohibited.

- BBCP has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI. (Use is prohibited).
- BBCP continually educates and trains its employees regarding the appropriate use of CPNI (use is prohibited). BBCP has established disciplinary procedures should an employee violate the CPNI procedures established by BBCP (Immediate termination).
- BBCP maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI (No use allowed). BBCP also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- BBCP has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of BBCP's compliance for a minimum period of one year. Specifically, BBCP's sales personnel obtain supervisory approval from the General Manager of any proposed outbound marketing request for customer approval regarding its CPNI (use is prohibited).